

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Acceleration of Broadband Deployment by)	WT Docket No. 13-238
Improving Wireless Facilities Siting Policies)	
)	
Acceleration of Broadband Deployment:)	WC Docket No. 11-59
Expanding the Reach and Reducing the Cost)	
of Broadband Deployment by Improving)	
Policies Regarding Public Rights of Way and)	
Wireless Facilities Siting)	
)	
Amendment of Parts 1 and 17 of the)	RM-11688 (terminated)
Commission's Rules Regarding Public)	
Notice Procedures for Processing Antenna)	
Structure Registration Applications for)	
Certain Temporary Towers)	
)	
2012 Biennial Review of)	WT Docket No. 13-32
Telecommunications Regulations)	
)	
To: The Commission		

**COMMENTS
OF
RAMA COMMUNICATIONS, INC.**

Rama Communications, Inc., ("RAMA"), by its attorney, pursuant to *Notice of Proposed Rule Making ("NPRM") FCC 13-122 (released September 26, 2013)*, hereby submits these Comments in the above-captioned rule making proceeding regarding the proposal of the Federal Communications Commission's ("Commission") efforts to streamline local application processes for wireless communications and structures. In support hereof, RAMA submits the following:

1. RAMA is a minority/woman owned company which is the Licensee of seven AM stations in Florida and Georgia.¹ RAMA is very interested in this proceeding as it involves collocation of wireless technology on existing towers. Specifically, Rama desires possible collocation of wireless services on its eleven owned AM towers. For years, AM towers have been labeled as unusable because they are “hot” radiators. Rama understands that today readily available technology exists whereby AM towers can be used for wireless services.²

2. Collocation of wireless equipment on pre-existing AM towers rather than constructing new towers is a quick way to expanding wireless coverage, and it avoids the protracted environmental review and other impacts with which all new wireless facilities encounter. As part of the NPRM, the Commission seeks to clarify the term “wireless tower” which congress set forth in *Section 6409(a)* of the Middle Class Tax Relief and Job Creation Act of 2012. Rama is very concerned that the term “wireless” may limit the collocation efforts rather than expand them. Rama recommends that the Commission make clear that a “wireless tower” *includes* all AM, FM and TV towers, together with other any structure built for the sole or primary purpose of supporting FCC-licensed antennas and their associated facilities.

3. By clarifying this definition, Rama believes this will open up new possibilities to AM broadcasters as possible collocation sites for wireless technology.

¹ RAMA's stations are: WLAA (AM), Winter Garden, FL; WMEL (AM), Cocoa Beach, FL; WNTF (AM), Bithlo, FL; WRFV (AM), Valdosta, GA; WOKB (AM), Winter Park, FL; WQBQ (AM), Leesburg, FL and WKIQ (AM), Eustis, FL.

² See workshop data set forth in the FCC Collocation Workshop, May 1, 2012.

This clarification could be another opportunity for long suffering AM broadcasters to revitalize that historic service³.

WHEREFORE, the forgoing premises considered, RAMA respectfully submits these instant Comments.

Respectfully submitted,

RAMA COMMUNICATIONS, INC.

By: _____

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It's Attorney

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³ The Commission is currently reviewing ways to revitalize AM broadcast service, *See Revitalization of the AM Radio Service, Notice of Proposed Rule Making ("NPRM")* FCC 13-139 (released October 31, 2013).